

# **EXHIBIT 15**

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK

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5 IN RE: TERRORIST :  
6 ATTACKS ON : 03-MDL-1570  
7 SEPTEMBER 11, 2001 : (GBD)(SN)

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10 Tuesday, March 26, 2019

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12 THIS TRANSCRIPT CONTAINS  
13 CONFIDENTIAL INFORMATION

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15 Day 1 of the videotaped deposition of  
16 FAHD MOHAMMAD SANAD ALHARBI, taken pursuant to  
17 notice, was held at the InterContinental Hotel  
18 Madrid, Paseo de la Castellana, 49, 28046  
19 Madrid, Spain, beginning at 9:55 a.m., on the  
20 above date, before Lisa V. Feissner, RDR, CRR,  
21 Notary Public.

22 - - -

23 GOLKOW LITIGATION SERVICES  
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24 deps@golkow.com

1 right?

2 A. Yes.

3 Q. Why was he leaving the Indonesia  
4 office?

5 MR. NASSAR: Objection, foundation.

6 A. I don't know.

7 Q. Was there someone who recommended  
8 you to take the position in the Indonesian  
9 office?

10 A. I think that my good performance I  
11 did is the factor or the reason why I was  
12 proposed for Indonesia.

13 Q. Did you request to be moved from  
14 Bangladesh to Indonesia?

15 A. No.

16 Q. Who asked you to do it?

17 A. The General Secretariat.

18 MR. NASSAR: "Of IIRO."

19 A. Of IIRO.

20 Q. And when you say the General  
21 Secretary, do you mean Adnan Basha?

22 INTERPRETER: He said "General  
23 Secretariat."

24 Q. General Secretariat. Well, I'm

1 asking, who is the person who asked you to do  
2 that?

3 A. I don't remember.

4 Q. Did you interview with someone  
5 regarding this job change?

6 A. No. I was known back then. They  
7 knew me, so I did not make any interviews.

8 Q. Did you speak with anybody about  
9 the Indonesia office before you went there?

10 A. I don't remember.

11 Q. Were you invited to take the job or  
12 were you told to take the job?

13 A. So I was --

14 (The witness and interpreter  
15 conferred in Arabic.)

16 A. So I was told to take the job, but  
17 I had to move to Indonesia and so on.

18 MR. NASSAR: I think the word in  
19 Arabic was (speaking Arabic),  
20 "requested."

21 INTERPRETER: Yes. "I was  
22 requested."

23 Q. And who was it that made that  
24 request?

1 A. I think the offices department.

2 Q. And who in the offices department?

3 A. I don't remember.

4 Q. In the process leading to your  
5 redeployment to manage the IIRO Indonesia  
6 office, did you discuss anything about what the  
7 job would entail?

8 A. With whom?

9 Q. That's my next question.  
10 Literally, on my paper, the next question is,  
11 "with whom?" Did you discuss anything with  
12 anybody?

13 A. About what? About which aspect?  
14 About living there, about working, about --

15 Q. Did you have any discussion about  
16 what the needs of the office are or were?

17 A. Yes, of course, we spoke with the  
18 offices department because I do not know that  
19 office.

20 Q. Did you discuss about what the  
21 expectations of the job would be?

22 A. My expectations?

23 Q. No, about what was expected of you.

24 A. It's to develop the work.

1 Q. Well, to be clear, there was a  
2 decision made to send Mr. Jamal specifically to  
3 the Secretary General at the same time that you  
4 were moved to Indonesia, correct?

5 A. Yes. The decisions were issued,  
6 but the implementation was not immediate. He  
7 had, for example, students, he would wait for  
8 the semester to finish, things like that.  
9 Things that -- so the implementation of the  
10 decision was not done in the same day or on the  
11 following day of its issuing.

12 Q. When the decision that's in 163 was  
13 made in the first month of 1425, which is  
14 roughly March 2, 2004, did you leave to go and  
15 follow the direction of Adnan Basha by leaving  
16 Bangladesh and going to Indonesia, or did you  
17 wait a few months?

18 A. I have waited a long period, yes.  
19 Three or four months.

20 Q. So it was three or four months  
21 before you followed the direction of Adnan  
22 Basha to do something?

23 A. Yes.

24 Q. What date was it you left the

1 Bangladesh office to go to Indonesia?

2 A. (In English.) I don't remember.

3 (Through interpreter.) I don't  
4 remember. I cannot remember.

5 Q. Do you remember what date you got  
6 to the Indonesia office?

7 A. I don't remember.

8 Q. Do you remember what month it was?

9 A. I don't remember.

10 Q. Do you remember what --

11 A. (In English.) In end of 2004.

12 Three months, four months in the end of 2004.

13 (Through interpreter.) In the end  
14 of 2004.

15 Q. Well, now you have me wondering  
16 even more, because 163 -- Exhibit 163 gives you  
17 direction at the beginning of 2004 in March,  
18 and you've told us that you waited two or three  
19 months, maybe three or four months rather three  
20 months --

21 A. I don't remember exactly. Yes,  
22 he's talking about the Arabic date.

23 Q. There is no Arabic date of 2004.

24 A. Where it's written 2004.

1 MR. HAEFELE: He just said it. It  
2 was in his answer. "Answer: 2004.  
3 Three months, four months in the end of  
4 2004."

5 A. That's what I can recall.

6 Q. All right. Just so we're clear,  
7 you were told in March of 2004 to depart the  
8 Bangladesh office and be redeployed to the  
9 Indonesia office, and your recollection is that  
10 it was the end of 2004 that you left the  
11 Bangladesh office to go to the Indonesia  
12 office?

13 MR. NASSAR: I'm going to object.  
14 I think the witness has answered this  
15 question multiple times.

16 Q. You can answer.

17 INTERPRETER: Should I translate?

18 MR. NASSAR: Yes, please.

19 A. So it's approximate, maybe in July,  
20 God knows.

21 MR. NASSAR: He said, "July or  
22 August." Did the witness say July,  
23 August?

24 INTERPRETER: I'm sorry. I didn't

1 from Bangladesh. No one was brought from  
2 outside the country. So in the same region  
3 where the teachers are.

4 INTERPRETER: And just a comment  
5 from the translator. He refers to the  
6 propagators as "teachers" and not as  
7 "du'at." Can I make this comment?

8 MS. KHATIB: (Inaudible.)

9 Q. How many propagators worked with  
10 IIRO Bangladesh office during the time period  
11 that you managed the office?

12 A. I don't remember.

13 Q. Do you know how it compared with  
14 the eight or nine people that worked on the  
15 staff of the IIRO office?

16 INTERPRETER: I do not understand  
17 the question.

18 Q. Do you know how the number of  
19 propagators compared to the number of IIRO  
20 staff in the Bangladesh office?

21 A. I cannot remember the number.  
22 About 40, 50. But I cannot remember the exact  
23 number.

24 Q. There was eight or nine staff

1 Q. And what was that employee's name?

2 A. I don't remember.

3 Q. Did you sign his reports?

4 A. Yes. I might review or just be  
5 acquainted, but not sign.

6 Q. Was that employee one of the eight  
7 or nine people in the staff of the IIRO office  
8 in Bangladesh?

9 A. I think so, yes.

10 Q. Were there -- do you recall ever  
11 doing any reports yourself to IIRO office in  
12 Saudi Arabia regarding the propagators in  
13 Bangladesh?

14 A. I cannot recall. I don't recall.

15 (The witness and interpreter  
16 conferred in Arabic.)

17 A. So let's say -- so reports about  
18 the propagators' activities, let's say he spoke  
19 in some mosque, so this information would reach  
20 us, and we would send it to the IIRO.

21 Q. Would you get periodic reports from  
22 the staff person that created the reports that  
23 you would then pass on to Saudi Arabia?

24 MR. DUFFY: Objection. Can you

1           Q.    So you would receive, on a periodic  
2   basis, one report for each propagator.  You  
3   would collect those reports, and those reports  
4   would get sent on to the General Secretariat of  
5   IIRO in the Kingdom of Saudi Arabia, correct?

6           A.    Yes.  And in the General  
7   Secretariat, there's a department, yes, the  
8   propagators department.

9           Q.    There's a propagators department at  
10  the General Secretariat in IIRO headquarters in  
11  Saudi Arabia?

12          A.    Yes.

13          Q.    And who heads that, or who -- at  
14  the time, who headed that committee -- or that  
15  department?

16          A.    I don't remember.

17          Q.    Is the da'wah department the same  
18  as the da'wah and Holy Quran committee?

19               MR. NASSAR:  I object to the  
20   foundation for that question.

21          A.    I do not remember.  Back then?

22          Q.    Back then.

23          A.    I don't remember.

24          Q.    Were you aware that the Kingdom of